

ATTACHMENT A

Annual Customer Proprietary Network Information Compliance Certification
EB Docket No. 06-36

BusinessNet Telecom, Inc.

CPNI OPERATING PROCEDURES

BUSINESSNET TELECOM, INC.
CPNI OPERATING PROCEDURES FOR ENSURING COMPLIANCE WITH
47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001

BusinessNet Telecom, Inc. d/b/a Transit Telecom has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in 47 C.F.R. §§ 64.2001- 64.2011 of the Commission's CPNI rules, as modified by the Commission in 2007.

CONFIDENTIALITY OF CARRIER INFORMATION

A telecommunications carrier that receives or obtains proprietary information from another carrier for purposes of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for its own marketing efforts..

COMPANY SERVICES PROVISION

BusinessNet Telecom, Inc. d/b/a Transit Telecom ("the Company") is an interexchange long distance service provider. The Company provides international services over dedicated lines to carrier customers pursuant to ICB contracts. The Company's carrier contracts uniformly contain confidentiality agreements that address the handling of carrier's information. It is the Company's policy not to disclose CPNI except as specifically set out in its contracts with its carrier customers and where required by law. The Company does not have access to the CPNI of the end users of its carrier customers. The Company does not provide any retail service including but not limited to presubscribed 1+ domestic or international long distance service.

CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")

CPNI includes information 1) that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and 2) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier. CPNI does not include subscriber list information, which is customer information published in a telephone directory, such as customer name, address, and telephone number.

SAFEGUARDING AGAINST PRETEXTING

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC if it discovers any new methods of pretexting and of any actions it takes against pretexters and data brokers.

MARKETING PROCEDURES

The Company markets its services solely through direct sales. The Company does not use CPNI for marketing purposes and therefore does not have to maintain records regarding marketing campaigns that use its customers' CPNI.

UTILIZATION OF CPNI

- (1) The Company obtains and utilizes CPNI solely for the purpose of providing interexchange and information services to its carrier customers, billing its carrier customers for its services, collecting payment for its services, and maintenance and repair of services. Where necessary, the Company may use, disclose or permit access to CPNI to protect its rights or property or the rights or property of its underlying carrier, to protect users of its services and other carriers from fraudulent, abusive, unlawful use of or unlawful subscription to its services.
- (2) The Company uses, discloses, or permits access to CPNI to provide or market service offerings among the interexchange and information category of service to which the Customer already subscribes.
- (3) The Company does not use, disclose, or permit access to CPNI to identify or track customers that call competing service providers or for any other purpose that is prohibited by the FCC's rules.
- (4) Without Customer approval, the Company does not use, disclose or permit access to CPNI to provide or market service offerings within a category of service that the Customer does not already subscribe in accordance with the FCC's rules.

CPNI DISCLOSURE TO THIRD-PARTIES

The Company does not disclose CPNI of its current or former customers to any third-party except as required by law or regulation, or under confidentiality agreements in accordance with FCC rules, or upon customer request.

CUSTOMER AUTHENTICATION

All customer information is maintained in a password protected database that can be accessed only by authorized employees such as dedicated account representatives. Authorized employees may access CPNI to address customer questions only when the person calling is listed as an "authorized contact" for the business customer. Changes to customer account records such as address, phone numbers or services must be requested in writing by an authorized customer contact. Release of CPNI and other customer information will be provided to authorized customer contacts orally, electronically, via mail, or other method in accordance with the provisions of the customer's contract. All such requests are verified by the Company.

TRAINING AND DISCIPLINE

The Company has an express disciplinary process in place for violation of the Company's practices and procedures regarding confidentiality of customer information including CPNI. The Company prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

NOTICE OF UNAUTHORIZED DISCLOSURE OF CPNI

As soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, The Company will provide electronic notification of the breach within seven business days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI") via the following web site, www.fcc.gov/eb/CPNI/. In order to allow law enforcement time to conduct an investigation, The Company will wait another seven business days before notifying the affected customers of the breach (unless the USSS and FBI request The Company to postpone disclosure). The Company may notify customers sooner if there is a risk of immediate and irreparable harm. The Company will maintain records of discovered breaches for at least two years.

ADDITIONAL SAFEGUARDS

- The Company has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- The Company designates one or more officers, as an agent or agents of the Company, to sign and file a CPNI compliance certificate on an annual basis.
- The Company does not disclose CPNI over the phone and does not allow for online access to CPNI.